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Attorneys for Defendants  
CITY OF SANTA CLARA, MIKE HORN,  
NATHAN CRESCINI, JOSH HIGGINS,  
FRANK HAGG, and TROY CARDIN

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

A. C., a minor, by and through his Guardian ) Case No.: C13-3276 HSG (NC)  
Ad Litem, MARK CALHOUN, )

Plaintiff, )

vs. )

CITY OF SANTA CLARA, a municipal )  
corporation; MIKE HORN, individually and in )  
his official capacities as a police officer for the )  
CITY OF SANTA CLARA Police Department; )  
NATHAN CRESCINI, individually and in his )  
official capacities as a police officer for the )  
CITY OF SANTA CLARA Police Department; )  
JOSH HIGGINS, individually and in his official )  
capacities as a police officer for the CITY OF )  
SANTA CLARA Police Department; FRANK )  
HAGG, individually and in his official capacities )  
as a police officer for the CITY OF SANTA )  
CLARA Police Department; TROY CARDIN; )  
individually and in his official capacities as a )  
police officer for the CITY OF SANTA CLARA )  
Police Department; and DOES 1-50, inclusive,, )

Defendant. )

**STIPULATION AND ~~PROPOSED~~  
ORDER EXTENDING DEADLINES FOR  
FACT DISCOVERY, EXPERT  
DISCLOSURE/DISCOVERY AND  
DISPOSITIVE MOTIONS**

The parties hereto, by and through their respective counsel, hereby stipulate and request that the current deadlines for fact discovery, expert disclosure and discovery, and dispositive motions be extended by approximately 30 days, as set forth below. The current trial date would not be affected by the requested extension.

The reason for the requested extension is that the parties require additional time to

1 conduct discovery. In particular, one of the defendant police officers is unable to sit for  
 2 deposition due to a serious injury he sustained in a car accident. It is anticipated that the officer  
 3 will be able to sit for deposition by mid-March. In addition, the parties require additional time  
 4 to complete other necessary party and witness depositions. The parties expect to have these  
 5 depositions completed by the end of March or early April. The undersigned attorneys are  
 6 working diligently to get these depositions scheduled in a coordinated and timely manner.

7 This is the first extension of the case schedule requested by the parties in this case. The  
 8 parties have agreed upon, and request the Court to adopt, the following new case schedule:

9 TRIAL DATE:	9/8/2015, at 8:30 a.m. (same as orig. date)
10 FINAL PRETRIAL CONFERENCE:	8/11/2015, at 3:00 p.m.
11 DISPOSITIVE MOTIONS:	Last day to be heard 7/2/2015, at 2:00 p.m. See Civil Local Rules for notice and filing requirements.
12 NON-EXPERT DISCOVERY CUT-OFF:	4/7/2015
13 EXPERT REPORTS:	Opening reports by 4/14/2015 Rebuttal reports by 5/5/2015
14 EXPERT DISCOVERY CUT-OFF:	5/22/2015

15  
16  
17  
18 IT IS SO STIPULATED.

19  
20 Dated: February 19, 2015

LAW OFFICES OF JOHN L. BURRIS

21 By: \*/s/ DeWitt M. Lacy  
 22 DeWitt M. Lacy  
 23 Attorneys for Plaintiffs  
 24 \*Mr. Lacy provided his consent that this document be electronically filed

25 Dated: February 19, 2015

HAAPALA, THOMPSON & ABERN, LLP


26 By: /s/ Rebecca S. Widen  
 27 Rebecca S. Widen  
 28 Attorneys for Defendants

**ORDER**

The Court having considered the parties' stipulation, and good cause appearing, IT IS  
HEREBY ORDERED that the current case schedule be extended as requested. The new case  
schedule shall be as follows:

TRIAL DATE:	9/8/2015, at 8:30 a.m. (same as orig. date)
FINAL PRETRIAL CONFERENCE:	8/11/2015, at 3:00 p.m.
DISPOSITIVE MOTIONS:	Last day to be heard 7/2/2015 at 2:00 p.m. See Civil Local Rules for notice and filing requirements.
NON-EXPERT DISCOVERY CUT-OFF:	4/7/2015
EXPERT REPORTS:	Opening reports by 4/14/2015 Rebuttal reports by 5/5/2015
EXPERT DISCOVERY CUT-OFF:	5/22/2015

Dated: 2/23/2015

  
\_\_\_\_\_  
Hon. Haywood S. Gilliam, Jr.  
United States District Judge

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